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REC'D TH  
REGULATORY AUTH.  
01 APR 17 PM 3 49  
OFFICE OF THE  
EXECUTIVE SECRETARY

April 17, 2001

David Waddell  
Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243

VIA HAND DELIVERY

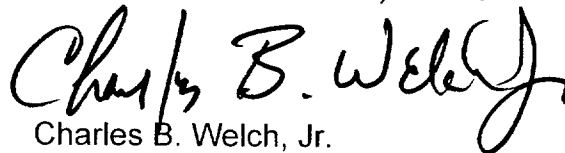
Re: *Docket to Establish Generic Performance Measures, Benchmarks and  
Enforcement Mechanisms for BellSouth Telecommunications, Inc.*  
Docket No. 01-00193

Dear Mr. Waddell:

Please find enclosed the original and thirteen copies of NewSouth Communications'  
Petition to Intervene in the above-captioned proceeding.

Very truly yours,

**FARRIS, MATHEWS, BRANAN,  
BOBANGO & HELLEN, P.L.C.**

  
Charles B. Welch, Jr.

CBW:lw

Enclosures

**BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

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<b>IN RE:</b>	)	
	)	
<b>DOCKET TO ESTABLISH GENERIC</b>	)	<b>Docket No. 01-00193</b>
<b>PERFORMANCE MEASUREMENTS,</b>	)	
<b>BENCHMARKS AND ENFORCEMENT</b>	)	
<b>MECHANISMS FOR BELL SOUTH</b>	)	
<b>TELECOMMUNICATIONS, INC.</b>	)	

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**PETITION OF NEWSOUTH COMMUNICATIONS TO INTERVENE**

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**COMES NOW** NewSouth Communications ("NewSouth") pursuant to T.C.A. §4-5-310, and petitions the Authority to intervene and participate in this proceeding as a matter of right.

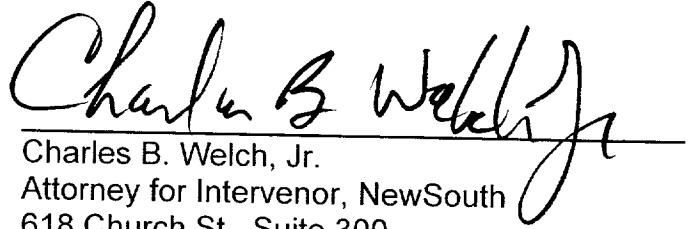
The above-captioned docket concerns the development of a common set of performance measurements, benchmarks and enforcement mechanisms to ensure that BellSouth Telecommunications, Inc. ("BellSouth") provides non-discriminatory access to its network elements as required by the Telecommunications Act of 1996.

Time Warner purchases network elements from BellSouth and therefore has an interest in the outcome of this proceeding. Allowing NewSouth to intervene will not impair the interests of justice or the orderly and prompt conduct of these proceedings.

**WHEREFORE, PREMISES CONSIDERED,** NewSouth respectfully requests that the TRA grant its Petition to Intervene.

Respectfully submitted,

**FARRIS, MATHEWS, BRANAN,  
BOBANGO & HELLEN, P.L.C.**

A handwritten signature in black ink, reading "Charles B. Welch, Jr.", written over a horizontal line.

Charles B. Welch, Jr.  
Attorney for Intervenor, NewSouth  
618 Church St., Suite 300  
Nashville, TN 37219  
(615) 726-1200

## CERTIFICATE OF SERVICE

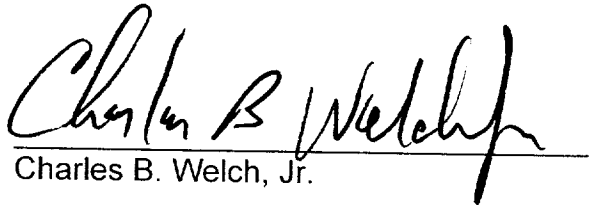
I hereby certify that a true and correct copy of the foregoing has been served by placing same in U.S. Mail, postage prepaid, this the 17<sup>th</sup> day of April, 2001, upon the following:

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BellSouth Telecommunications, Inc.  
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